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United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v. Idaisa Rivera-Camara DOB: 1959; United States	MACHERIA ORDERO CONTROL DE CONTROL DE LA CALCADA DE LA CALCADA DE
John Michael Puglisi DOB: 1977; United States	MAGISTRATESOCASE 25 NJ

Complaint for violation of Title 8 United States Code § 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i)

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about July 24, 2019, at or near Robles Junction, in the District of Arizona, **Idaisa Rivera-Camara** and **John Michael Puglisi**, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, namely Jorge Geovani Doblado-Colindres, Olga Marina Ramirez-Gomez, Wilber Alfredo Mendez-Villalta, and Juan Jesus Morga-Mancinas, and did so for the purpose of private financial gain; in violation of **Title 8, United States Code**, Sections 1324(a)(1)(A); 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about July 24, 2019, at or near Robles Junction, in the District of Arizona, United States Border Patrol Agents (BPA) observed a 2019 Mitsubishi Mirage and a 2013 Honda Civic traveling in tandem northbound on Fuller Rd. Both vehicles briefly stopped on the side of the road and multiple suspected illegal aliens ran across the road and got into both vehicles. The vehicles made a U-turn and continued south towards SR-86. BPA activated his emergency lights and both vehicles stopped. The driver of the Mitsubishi was identified as **Idaisa Rivera-Camara** and the driver of the Civic was identified as **John Michael Puglisi**, both United States Citizens. Five subjects fled from **Puglisi**'s vehicle but were apprehended shortly after. A total of ten passengers were arrested from both vehicles and BPA determined that they were in the United States illegally. Four passengers were identified as Jorge Geovani Doblado-Colindres, Olga Marina Ramirez-Gomez, Wilber Alfredo Mendez-Villalta, and Juan Jesus Morga-Mancinas. Record checks revealed that the Mitsubishi was registered to **Rivera** and the Honda was registered to **Puglisi**.

Material witnesses Doblado, Ramirez, Mendez, and Morga stated that they or a family member had made arrangements to be smuggled into the United States for money. Doblado stated he crossed the International Boundary Fence in a group of fifteen subjects. Doblado stated only 10 of the members of the group arrived at the designated load up spot. Doblado stated the guide told them to wait for two pickup vehicles and the drivers would stop and honk the horn. Ramirez stated two white four door vehicles arrived, stopped, and honked the horn. Ramirez and Mendez described the driver of the vehicle as a black skinned short haired person. Ramirez stated the driver was the same person who transported the group to milepost 138 in the same vehicle, the night before. Doblado stated he got in one of the vehicles and described the driver as a white male with facial hair. Morga described the driver as an old, light-skinned male.

In a post-Miranda statement, Rivera stated that she was asked to pick up and transport 10 individuals for \$200 USD. She was going to drop them off at an unknown location. Rivera stated she could not fit 10 people in her car, so another subject, later identified as **Puglisi**, was sent in a different vehicle to pick up some of the individuals. Rivera stated both vehicles arrived at the GPS location and Rivera sounded her horn, as she was instructed. Rivera stated she knew that they were illegal aliens, but claimed she did not know beforehand. Rivera claimed that the only money she was given was for gas and for food for the individuals.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Jorge Geovani Doblado-Colindres, Olga Marina Ramirez-Gomez, Wilber Alfredo Mendez-Villalta, and Juan Jesus Morga-Mancinas

Detention Requested

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge

AUTHORIZED BY: AUSA RW/ri

Sworn to before me and subscribed in my presence.

SIGNATURE OF MAGISTRATE JUDGE¹

DATE

July 25, 2019